



Always There for You!

Submitted via e-mail and U.S. Mail

March 1, 2019

Mr. Wayne Nastri, Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

RE: Proposed Amendment to Rule 1470, Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignitions Engines

Dear Mr. Nastri:

The undersigned water agencies request your consideration of an amendment to Rule 1470, Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignitions Engines, to ensure that emergency backup generators that power critical public water system facilities during emergencies can be adequately maintained and tested in accordance with National Fire Protection Association (NFPA) standards.

In 2018, California experienced one of the most devastating wildfire seasons on record. The Woolsey Fire in Southern California burned nearly 100,000 acres, destroyed 1,643 buildings and resulted in three fatalities. In the early morning hours of November 9, 2018, Las Virgenes Municipal Water District (LVMWD) lost power to nearly all of its facilities due to the fire. Emergency backup generators were deployed to restore the operation of critical pump stations to refill water storage tanks that were being depleted due to firefighting. Nevertheless, a sequence of events ultimately lead to a loss of water system pressure and issuance of boil water notice for a portion of LVMWD's service area. Among the challenges faced by LVMWD during the fire was the failure of emergency generators when placed under load conditions for an extended period of time.

NFPA 110, Standard for Emergency and Standby Power System, outlines rigorous maintenance and testing procedures for emergency backup generators. The requirements of the standard are cited as necessary to obtain a minimum level of reliability and performance, particularly where life safety electrical power needs are involved. However, subparagraph (c)(3)(C) of Rule 1470 limits the annual maintenance and testing of the diesel-fueled compression ignitions engines that power these emergency backup generators to as little as 20 hours. The prescribed NFPA 110 maintenance and testing procedures, including monthly exercising and periodic load tests, cannot be effectively performed while adhering to the strict operating hour limits established by Rule 1470.

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Paragraph (h)(13) of Rule 1470 recognizes the importance of NFPA standards for testing fire protection systems and appropriately exempts in-use emergency fire pump assemblies from the limits of subparagraph (c)(3)(C), provided they are only operated the number of hours necessary to comply with NFPA 25. Unfortunately, there is not a similar provision for emergency backup generators that are designated to provide emergency power to critical public water system facilities required for fire protection. We recommend that such a provision be added for emergency backup generators.

Enclosed for your review is a proposed amendment to Rule 1470, paragraph (h)(13) to ensure that emergency backup generators used to power critical water system facilities can be adequately maintained and tested, in accordance with NFPA standards, for reliable operation during emergencies.

Thank you for considering this important proposal. In the coming weeks, we would like to propose scheduling a meeting with you and your staff to discuss this issue and the potential solutions in more detail. David W. Pedersen, General Manager of Las Virgenes Municipal Water District, will contact your office to arrange the meeting. In the meantime, you can reach him at (818) 251-2122 or dpedersen@lvmwd.com.

Sincerely,



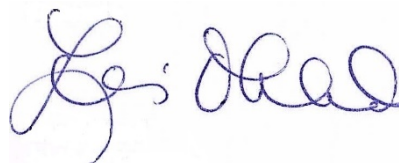
David W. Pedersen, P.E.
General Manager
Las Virgenes Municipal Water District



Stephen L. Cole
Assistant General Manager
Santa Clarita Valley Water Agency



Paul A. Cook
General Manager
Irvine Ranch Water District



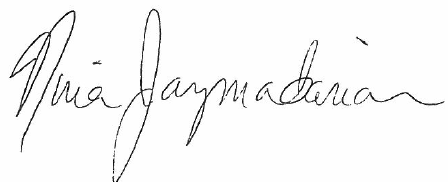
Lisa Ohlund
General Manager
East Orange County Water District



Charles Wilson
Executive Director
Southern California Water Coalition



Paul D. Jones II, P.E.
General Manager
Eastern Municipal Water District



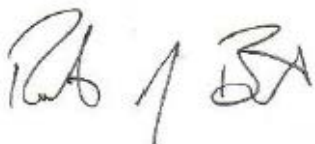
Nina Jazmadarian
General Manager
Foothill Municipal Water District



Robert J. Hunter
General Manager
Municipal Water District
of Orange County



Tom A. Love
General Manager
Upper San Gabriel Valley
Municipal Water District



Robert Beste
Public Works Director
City of Torrance



Chris Berch, P.E.
Executive Manager of Engineering/
Assistant General Manager
Inland Empire Utilities Agency



Paul E. Shoenberger, P.E.
General Manager
Mesa Water District



Matthew Litchfield, P.E.
General Manager/Chief Engineer
Three Valleys Municipal Water District



Daniel R. Feron
General Manager
Santa Margarita Water District



Michael Moore
Assistant General Manager, Water Serv.
City of Anaheim



Richard H. Wilson, P.E.
Assistant General Manager,
Water Systems
Burbank Water and Power

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A handwritten signature in black ink, appearing to read "Jim Barrett". The signature is stylized with a large, sweeping "J" and "B".

Jim Barrett
General Manager
Coachella Valley Water District

A handwritten signature in blue ink, appearing to read "Craig Miller". The signature is fluid and cursive.

Craig Miller
General Manager
Western Municipal Water District

A handwritten signature in black ink, appearing to read "Jeff Kightlinger". The signature is cursive and somewhat stylized.

Jeff Kightlinger
General Manager
Metropolitan Water District of
Southern California

PROPOSED AMENDMENT TO RULE 1470, Paragraph (h)(13)

Existing Language

(13) The requirements of subparagraph (c)(3)(C) do not apply to in-use emergency fire pump assemblies that are driven directly by stationary diesel-fueled CI engines and only operated the number of hours necessary to comply with the testing requirements of National Fire Protection Association (NFPA) 25 - *Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems*, 2002 edition or the most current edition, which is incorporated herein by reference.

Proposed Language

(13) The requirements of subparagraph (c)(3)(C) do not apply to **the following:**

- (A) in-use emergency fire pump assemblies that are driven directly by stationary diesel-fueled CI engines and only operated the number of hours necessary to comply with the testing requirements of National Fire Protection Association (NFPA) 25 - *Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems*, 2002 edition or the most current edition, which is incorporated herein by reference; **or**
- (B) emergency backup generators driven directly by stationary diesel-fueled CI engines, designated to provide emergency backup power to critical public water system facilities required for fire protection, and only operated the number of hours necessary to comply with the testing requirements of National Fire Protection Association (NFPA) 110 - *Standard for Emergency and Standby Power Systems*, 2019 edition or the most current edition, which is incorporated herein by reference.**